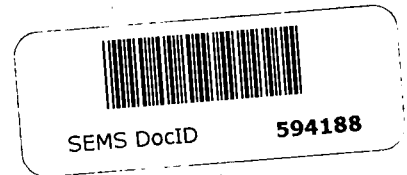




Commonwealth of Massachusetts
Executive Office of Environmental Affairs

**Department of
Environmental Protection**
Metro Boston/Northeast Regional Office



William F. Weld
Governor

Trudy S. Coxe
Secretary, EOE

Thomas B. Powers
Acting Commissioner

URGENT LEGAL MATTER: PROMPT REPLY NECESSARY

REQUEST FOR INFORMATION

APR 25 1995

M.G.L. C. 21E, §§ 2, 4, & 8

Certified mail, return receipt requested: # _____

T.H. Glennon Company, Inc. RE: MIDDLETON - Adhesive Manufacturer
26 Fanaras Drive School Street
Salisbury, MA 01952 Release Tracking No. 3-0168

Attention: Mr. Richard J. Shea, President

Dear Mr. Shea:

The Massachusetts Department of Environmental Protection ("DEP") is investigating a release and/or threat of release of oil and/or hazardous materials at the above-referenced site. Pursuant to DEP's authority to gather information, and to investigate, sample, and inspect records, conditions, equipment, practices, and property under M.G.L. c. 21E, §§ 2, 4, and 8, and 310 CMR 40.0165, you (as used in this Request for Information ("RFI"), the term "you" refers to T.H. Glennon Company, Inc. ("Glennon"), and any of its subsidiaries, directors, officers, employees, attorneys, agents, representatives, and/or anyone acting on behalf of it) are directed to provide DEP with the information requested below before the close of business on May 15, 1995. This deadline constitutes an **Interim Deadline** pursuant to 310 CMR 40.0167. If you fail to comply with this Request for Information, including but not limited to the deadline established above, you could be subject to legal action. Such action could include criminal prosecution, court-imposed civil penalties, and/or civil administrative penalties assessed by DEP.

I. INSTRUCTIONS

Sources of information used to respond to this Request for Information should include, but should not be limited to, business records; environmental assessment reports prepared by you or your

consultants; environmental audits analyzing facility operations and practices, and the adequacy of those systems to achieve, maintain, and monitor compliance; and past and present company publications, such as magazines, newsletters and annual reports. Interviews with present and former employees should be conducted if necessary to obtain the information requested.

A separate response must be made to each request set forth in this Request for Information. You are requested to precede each response in your reply with the number of the request to which it corresponds.

Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request with a written response setting forth such information.

For each and every request contained herein, if information responsive to the request is not in your possession, custody or control, you must state that you do not have the information requested and, if you know, identify the persons from whom such information may be obtained.

Unless otherwise specified, you must provide a photocopy of each and every document identified in your responses to the request set forth below, unless you claim any such document is protected from disclosure.

For each and every such document which you claim is protected from disclosure, you must separate the parts of those documents which you do not claim are protected from the parts which you claim are protected, and state the nature of the protected information and the basis for your claim the document is protected from disclosure.

If any document requested is not in your possession, custody, or control, you must state that you do not have the information requested and, if you have such knowledge identify the person(s) from whom such information may be obtained.

The fact that investigation is continuing shall not excuse failure to answer each request as fully as possible. You must promptly amend or supplement any response hereto upon obtaining new information which is material to any such request or to correct any errors or omissions in any response hereto.

Please see Attachment A for the definition of terms that may help you in completing this Request for Information.

II. REQUESTS

1. If at any time you owned the Site or operated any business at the Site please:

- a. state the dates of your ownership of the Site and/or operation of the business;
 - b. identify the person or entity from whom you acquired your ownership of the Site and/or operation of the business;
 - c. identify the person or entity to whom you transferred ownership of the Site and/or operation of the business;
 - d. describe in detail the name and nature of the business you operated at the Site;
 - e. describe in detail the nature of your operation of said business; and
 - f. identify all oil and/or hazardous materials used in your operation of said business. In responding to this request, please provide a list of oil/hazardous materials used at the Site and the quantity used, and a description of material handling and disposal practices used at the Site.
2. If at any time you owned or operated any underground storage tank presently or previously located at the Site, please provide:
- a. the date each tank was installed at the Site and documentation of same;
 - b. a statement of the capacity of each tank;
 - c. a statement or map indicating where on the Site each tank was or is located, (including a statement of whether it was located underground or aboveground);
 - d. a statement of the type(s) of oil and/or hazardous material stored in each tank;
 - e. a description of the maintenance and repair(s) of each tank since its installation at the Site;
 - f. the date each tank was removed from the Site and documentation of the same;
 - g. a description of the condition of each tank upon removal, including, without limitation, any holes, defects, or evidence of spillage or leakage;
 - h. a description of the removal of each tank and related contaminated soil (if any) from the Site;
 - i. a statement of how, where and by whom each tank and related contaminated soil (if any) was disposed of; and

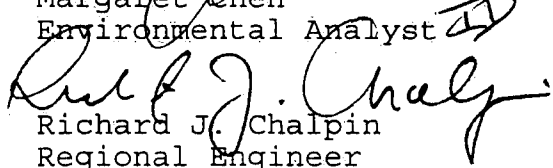
j. an identification of all persons who participated in or were present during the removal of each tank and related contaminated soil (if any).

3. Please produce a copy of all documents which relate to, refer to or evidence the information requested in Requests Numbers 1 and 2.

DEP encourages you to give this matter your immediate attention and to respond within the time specified above. Your response should be sent to Margaret Chen at the letterhead address. If you have any questions regarding this Request for Information, please contact Margaret Chen at the address stated on the letterhead above, or by telephoning (617) 932-7711.

Sincerely,


Margaret Chen
Environmental Analyst


Richard J. Chalpin
Regional Engineer
Bureau of Waste Site Cleanup

Attachment

cc: DEP/NERO/BWSC, Data Entry/File
Ms. Nancy M. Jones, Chairman, Board of Selectmen
Town of Middleton, 48 South Main Street, Middleton, MA 01949
Mr. Leo Cormier, Health Agent, Middleton Board of Health
195 North Main Street, Middleton, MA 01949

Attachment A: Request for Information Definitions

The following definitions are provided to assist you in completing the attached Request for Information. Unless otherwise specified below, words and phrases used in this Request for Information shall have the meaning ascribed to such words and phrases by M.G.L. c. 21E, § 2, and/or 310 CMR 40.0006, the Massachusetts Contingency Plan, unless the context clearly indicates otherwise.

The following definitions shall apply to the following words and phrases as they appear in this Request for Information, unless the context clearly indicates otherwise:

Agency and agency each mean and include, in the plural as well as the singular, any agency, authority, board, commission, department, office, or political subdivision of the federal state or local government.

Communication and communication each mean, in the plural as well as the singular, any manner or form of information or message transmission, however produced or reproduced, whether by document, orally or otherwise, that is made, distributed or circulated between or among persons or data storage or processing units and any and all documents containing, consisting of or in any way relating or referring to a communication.

Document and document each mean and include, in the plural as well as the singular, writing or recordings of any nature whatsoever within the possession, custody, or control of you (including, without limitations, attorneys, investment advisors, investment bankers and accountants) or any other person acting or purporting to act for or on behalf of you or in concert with you, including, but not limited to, contracts, agreements, communications, correspondence, telegrams, memoranda, records, reports, books, logs, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, forecasts, statistical statements, work papers, drafts, copies, graphs, charts, accounts, analytical records, minutes or records of meetings or conferences, consultant's reports, appraisals, records, reports or summaries of negotiations, press releases, drafts, notes, marginal notations, bills, invoices, checks, photographs, journals, and all other written, printed, recorded or photographic matter or sound production, however produced or reproduced.

For purposes of the foregoing, "drafts" mean any earlier preliminary, preparatory or tentative version of all or part of a document, whether or not such draft was superseded by a later draft and whether or not the terms of the final draft are the same as or different from the terms of the final document; and the term "copies" mean each and every copy of any document that is not identical in every respect to the document being produced.

Identify and identify each mean (a) with respect to a natural person, to state the person's full name, present or last known business and home address and business and home telephone number, present or last known job title, position or business and responsibilities in that position; and his or her immediate superior, his or her superior's title or position, and his or her superior's responsibilities and immediate superior; (b) with respect to persons other than natural persons, to state its proper name or designation, the address of its principal office, legal form (i.e. corporation, partnership, etc.), and a brief description of its business; and (c) with respect to a document, to state whether that document currently is in existence, the date the document bears or bore or if undated, the date it was written; the name and address of each person who wrote it or participated in the writing of it, the name and address of each person to whom it was addressed and each person to whom a copy was identified as being directed; the name and address of each person who received a copy of the document; a description of the type of document, a detailed summary of the contents of the document, its present location or the custodian of each copy or if unknown, its last known location or custodian; and if the document is no longer in existence or no longer is in your possession, custody or control, the disposition made of it, the reason or reasons for such disposition and the date thereof.

Person and person each mean, in the plural as well as the singular, any agency or political subdivision of the federal, state or local government; any state, public or private corporation or authority; any individual, trust, firm, joint stock company, partnership, association or other entity; any officer, employee, or agent of such person; and any group of persons.

The words "and" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of the request all responses which might otherwise be construed to be outside its scope.